

FORM TO BE USED BY A LITIGANT FILING  
A MOTION FOR PRO BONO COUNSEL

United States District Court  
For the District of New Jersey

RECEIVED  
APR 07 2016

AT 8:30 M  
WILLIAM T. WALSH  
CJ FRK

CYNTHIA BAKER : Motion for Pro Bono Counsel  
LAURA RAMOS : 28 U.S.C. § 1915 (e)(1)  
Plaintiff, :  
: Civil Action No. \_\_\_\_\_  
v. :  
RARITAN VALLEY :  
HABITAT FOR HUMANITY, ET AL :  
\_\_\_\_\_  
\_\_\_\_\_  
Defendants. :  
\_\_\_\_\_

INSTRUCTIONS – READ CAREFULLY

1. There is no constitutional guarantee to representation in civil cases. However, pursuant to 28 U.S.C. § 1915(e)(1), a district court may request an attorney to represent a person who has been granted permission to proceed in forma pauperis in the action and is unable to afford counsel.
2. If you have been granted permission to proceed in forma pauperis pursuant to 28 U.S.C. § 1915, you are unable to afford counsel, and you feel that you need counsel to represent you in the action, then you may ask the judge assigned to your case to request a pro bono (free of charge) attorney to represent you by completing and filing the attached "Motion for Pro Bono Counsel." If the defendant has been served with the summons and complaint in the case, you must mail to him/her or their lawyer (if the individual has one) a copy of your motion and file with the Court a certification proving service of your motion on your adversaries.

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6. At any time during the process of trying to locate a pro bono attorney for you, you have the right to withdraw your motion for Pro Bono Counsel and continue to represent yourself.
7. If an attorney decides to accept your case, you will be notified by the Clerk's Office by mail.
8. Please note that you are fully responsible for prosecuting your case by yourself, unless and until the Clerk's Office notifies you by mail that a pro bono attorney will represent you in the action **AND** the attorney informs the Court in writing that he/she is representing you in the action. Even though you may have filed a Motion for Pro Bono Counsel, the failure on your part to prosecute your case at any stage of the proceedings may result in dismissal of your case.

**QUESTIONS TO BE ANSWERED**

1. Name of movants: CYNTHIA BAKER AND LAURA RAMOS
- 2a. Have you previously requested counsel from the court in this case? NO
- 2b. If so, what was the outcome?  
\_\_\_\_\_  
\_\_\_\_\_
3. Explain specifically why you feel you need a lawyer to represent you at this time. If the judge denied your previous Motion for Pro Bono Counsel in this case, please include any changes concerning your need for counsel since your last motion (Use additional paper if necessary.)

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3. PLEASE SEE ATTACHED

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4. If you have been unable to attain an attorney, please explain why.

WE ARE NOT ABLE TO AFFORD AN ATTORNEY.

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5. If you need a lawyer who speaks in a language other than English, state what language you speak: \_\_\_\_\_

I understand that if a lawyer volunteers to represent me and my lawyer learns that I can afford to pay for a lawyer, the lawyer may give this information to the Court.

I hereby waive my privilege of attorney-client confidentiality to the extent necessary for my pro bono attorney to make an application to be relieved as provided in Appendix H of the Local Civil Rules.

I declare under the penalties of perjury that my answers to the foregoing questions are true to the best of my knowledge.

#3.

April 7, 2016

Cynthia Baker and  
Laura Ramos, Plaintiffs  
v.  
Raritan Valley Habitat for Humanity, et al

Your Honor:

Our claim has merit and is vital to us, the citizens of New Jersey and all disabled Americans to have equal housing choice and greater housing opportunities without discrimination as set forth in all the fair housing laws.

The injuries that we sustained which lead to our disabilities make it necessary for us to receive income and housing assistance. Due to our low income status, we applied and were accepted into the New Jersey Department of Community Affairs Public Housing Authority's Home Ownership Program in 2005. We were hopeful that we would now realize our dream of an accessible home of our own.

We chose Habitat for Humanity because of their mission to help people with low income to "be successful homeowners". We read that local Habitat Affiliates, here in New Jersey had built handicapped accessible homes in Morris County, Plainfield and Atlantic City. It has been eleven years (11) since we started the process to become homeowners. The housing discrimination we have endured at the Federal, State and local levels has been the source of our unsuccessful bid for an accessible home. The fair housing laws are clear about disability discrimination, yet is our experience that the very laws written for protection are clearly not respected or enforced by the agencies and organizations that are to uphold them..

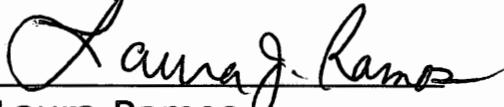
While we understand the broader concepts of the law outlined in the FHA, ADA and HUD, the legal issues in our claim are very complex and without an attorney to represent us, we would not be able to present a complete and effective case. We lack the knowledge of court rules and procedures and the intricate law necessary to translate our issues and injuries into the appropriate law and remedies. In addition, our disabilities inhibit and would often prohibit our ability to participate in the court process and proceedings requisite to our success.

Our election to file Pro Se is due to the fact that we cannot afford to hire counsel to represent us. It is our hope that your will see the merit of our claim and grant our Motion For Pro Bono Counsel. In our research, we have found two outstanding firms that specialize in fair housing cases. Lowenstein, Sandler, which has a local office here in New Jersey, is committed to pro bono work exclusively through their Lowenstein Center for the Public Interest. The D.C. firm of Relman, Dane and Colfax, is also one of the best and takes cases in all parts of the country. Both firms have been beyond our reach, though, we are hopeful that if a suggestion of this court is possible, we might have a chance at representation by either firm.

We need to present our case and with pro bono counsel, have the opportunity to win a victory, not only for ourselves, but for all people with disabilities seeking to have their own homes with a just process free of discrimination.

Respectfully submitted, this 7<sup>th</sup> day of April, 2016,

  
\_\_\_\_\_  
Cynthia Baker

  
\_\_\_\_\_  
Laura Ramos

**Your Benefit Amount****SOCIAL SECURITY DISABILITY**

BENEFICIARY'S NAME: CYNTHIA A BAKER

We review Social Security benefits each year to make sure they keep up with the cost of living. The law does not permit an increase in benefits when there is no increase in the cost of living. So your benefit will stay the same in 2016. There was no increase in the cost of living during the past year based on the Consumer Price Index (CPI) published by the Department of Labor. The CPI is the Federal government's official measure used to calculate cost of living increases.

**How Much Will I Get And When?**

• Your monthly amount (before deductions) is	<u>\$832.00</u>
• The amount we deduct for Medicare medical insurance is (If you did not have Medicare as of November 20, 2015, or if someone else pays your premium, we show \$0.00.)	<u>\$0.00</u>
• The amount we deduct for your Medicare prescription drug plan is (If you did not elect withholding as of November 1, 2015, we show \$0.00.)	<u>\$0.00</u>
• The amount we deduct for voluntary Federal tax withholding is (If you did not elect voluntary tax withholding as of November 20, 2015, we show \$0.00.)	<u>\$0.00</u>
• After we take any other deductions, you will receive on or about Dec. 31, 2015.	<u>\$832.00</u>

If you disagree with any of these amounts, you must write to us within 60 days from the date you receive this letter. We would be happy to review the amounts.

If you receive a paper check and want to switch to an electronic payment, please visit the Department of the Treasury's Go Direct website at [www.godirect.org](http://www.godirect.org) online.

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**What If I Have Questions?**

Visit our website at [www.socialsecurity.gov](http://www.socialsecurity.gov) for more information about Social Security. Call us toll-free at 1-800-772-1213 (TTY 1-800-325-0778) if you have questions. If you speak Spanish, press 7. For other languages, wait until we answer, and then ask for an interpreter. Contact your local Social Security office, or contact any United States embassy or consulate office when outside the United States.

134 S FOURTH ST  
EASTON PA 18042

**Help For Elders**

The Eldercare Locator is a free service of the U.S. Administration on Aging. Call 1-800-677-1116 or visit [www.eldercare.gov](http://www.eldercare.gov) to learn about financial, employment, legal, and caregiving help for seniors.

**BENEFICIARY'S NAME: LAURA J RAMOS**

We review Social Security benefits each year to make sure they keep up with the cost of living. The law does not permit an increase in benefits when there is no increase in the cost of living. So your benefit will stay the same in 2016. There was no increase in the cost of living during the past year based on the Consumer Price Index (CPI) published by the Department of Labor. The CPI is the Federal government's official measure used to calculate cost of living increases.

## **How Much Will I Get And When?**

• Your monthly amount (before deductions) is	<u>\$907.90</u>
• The amount we deduct for Medicare medical insurance is (If you did not have Medicare as of November 20, 2015, or if someone else pays your premium, we show \$0.00.)	<u>\$104.90</u>
• The amount we deduct for your Medicare prescription drug plan is (If you did not elect withholding as of November 1, 2015, we show \$0.00.)	<u>\$0.00</u>
• The amount we deduct for voluntary Federal tax withholding is (If you did not elect voluntary tax withholding as of November 20, 2015, we show \$0.00.)	<u>\$0.00</u>
• After we take any other deductions, you will receive on or about Dec. 31, 2015.	<u>\$803.00</u>

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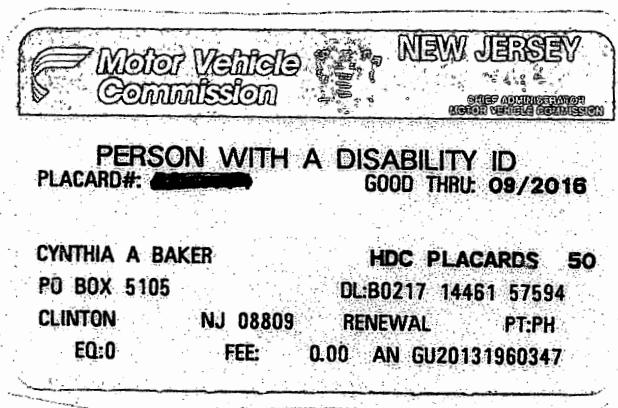
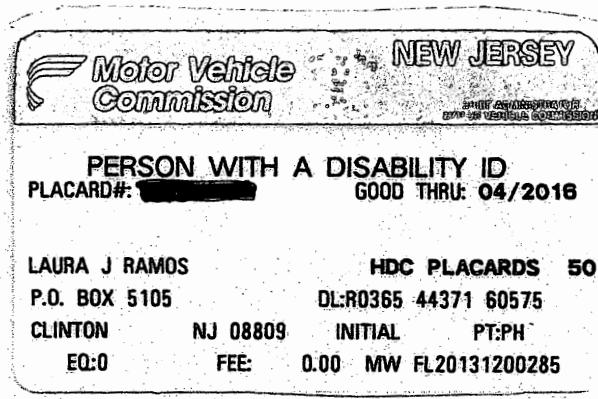
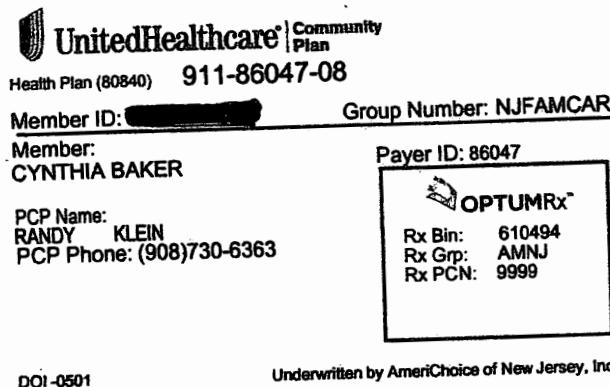
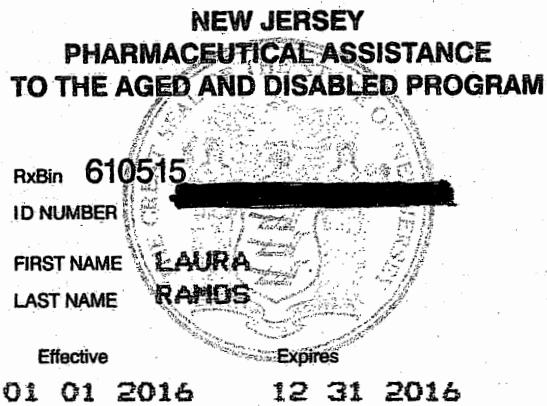
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CYNTHIA BAKERLAURA RAMOSMEDICADE



CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

State of New Jersey  
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT  
PO BOX 399  
TRENTON, NEW JERSEY 08625-0399

HAROLD J. WIRTHS  
*Commissioner*

October 26, 2015

Ms. Laura J. Ramos  
P O Box 5105  
Clinton, NJ 08809

WORKMAN'S COMPENSATION BENEFIT  
MONTHLY : \$853.14

Re: Laura J. Ramos  
SS#: [REDACTED]  
CL#: 66047-S

Dear Ms. Ramos:

In response to your recent request of this office, the following information is provided.

You are currently receiving benefits from the Second Injury Fund through the Office of Special Compensation Funds in the amount of \$393.76 bi-weekly. These lifetime benefits began 11/12/05 and will cease upon the death of the beneficiary.

Should you have any further questions in this matter, please do not hesitate to contact our office.

Sincerely,

Larry J. Crider, Administrator  
Office of Special Compensation Funds

New Jersey Is An Equal Opportunity Employer

**LWD**  
LABOR AND WORKFORCE DEVELOPMENT

DIVISION OF WORKERS' COMPENSATION  
OFFICE OF SPECIAL COMPENSATION FUNDS

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AD-18.14C (R 02-10)

LAURA RAMOS:



Financial Services

ANNUITY : 771.00 PER YEAR = \$64.25 PER MONTH

November 12, 2015

L. Ramos  
P.O. Box 5105  
Clinton, NJ 08809

Dear Ms. Ramos:

Thank you for contacting TIAA-CREF about your contracts. On November 09, 2015 you telephoned our Participant Services Group and spoke with Thanh Nguyen. During your conversation, you asked us to confirm some information about your Transfer Payout Annuity (TPA) contract. It is my pleasure to assist you.

Your TPA contract IH34AC8 was established in December of 2011 and has six annual payments remaining, with the final annual payment being in December of 2020. Your December 2, 2014 payment of \$772.57 was rolled over to your Traditional Individual Retirement Account (IRA) contract [REDACTED]. Subsequently, on December 5, 2014 a cash distribution was taken for 100% of your IRA accumulation balance in the amount of \$772.63 gross. Your estimated December 2015 TPA payment is \$771.00 of which \$231.30 would be from Employee Pre-Tax Match funds and \$539.70 would be from Employer Match funds.

As of November 12, 2015 the account balance in your IRA [REDACTED] is \$0.00 and your TPA IH34AC8 contract has a balance of \$4,139.90. Of the \$4,139.90 remaining \$1,241.82 is Employee Pre-Tax Match funds and \$2,898.08 is Employer Match funds. It is important to note that lump-sum and advance payments are not available from your TPA contract IH34AC8 and we are unable to change or accelerate the payment date of the contract. Additionally, there are no additional funds available for withdrawal from any of your TIAA-CREF contracts at this time.

For further assistance with this matter, please call our Participant Services Group at (800) 842-2776. Consultants are available weekdays from 8 a.m. to 10 p.m. and Saturdays from 9 a.m. to 6 p.m. (ET). Additional information on TIAA-CREF services can also be found on our website at [www.tiaa-cref.org](http://www.tiaa-cref.org).

Sincerely,

TIAA CREF